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	J. BRUCE ALVERSON, ESQ.				
2	Nevada Bar No. 1339				
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	702-384-7000 Phone				
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_	Attorneys for Defendants				
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8	UNITED STATES DISTRICT COURT				
9	FOR THE DISTRICT OF NEVADA				
10	HMMN DETERGON in the trailing and an	CASE NO.			
10	JIMMY PETERSON, individually, and as Guardian ad Litem for CHARLOTTE-MARIE-	CASE NO:			
11	SMITH-PETERSON, a minor,				
11	SWITTI-1 ETERSON, a lilliot,				
12	Plaintiffs,				
	,				
13	v.				
14	TELICIA DA'SHANEE HALL, an individual;				
	NEW PRIME, INC., a Foreign Corporation; and				
15	DOES I through X, inclusive				
16	Defendants.				
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DEFENDANT NEW PRIME, INC.'S STATEMENT CONCERNING REMOVAL

COMES NOW Defendant NEW PRIME, INC. and provides the following Statement Concerning Removal:

The dates on which you were served with a copy of the Complaint in the removed 1. action: Defendant NEW PRIME, INC. received a copy of the Complaint via personal service on June 30, 2017. Upon information and belief, Defendant TELICIA DA'SHANEE HALL has not yet been properly served with the Summons and Complaint.

2. The dates on which you were served with a copy of the Summons: Defendant NEW PRIME, INC. was served with a copy of the Summons on June 30, 2017.

3. In removals based on diversity jurisdiction, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's evidence of the amount in controversy: The removal of this action is based on diversity jurisdiction. Upon information and belief, Plaintiffs JIMMY PETERSON and CHARLOTTE-MARIE SMITH-PETERSON are and remain citizens of the State of Nevada. Upon information and belief, Defendant TELICIA DA'SHANEE HALL is and remains a citizen of the State of Missouri. Defendant NEW PRIME, INC. is a Nebraska corporation.

In addition, Defendant removed this action based on its belief that the amount in controversy, exclusive of interest and costs, exceeds \$75,000.00. Plaintiffs have alleged that they sustained personal injuries, including "disability, mental and physical pain and suffering, disfigurement, loss of enjoyment of life, hedonic damages and loss of household services." Plaintiffs further allege that they have incurred medical bills and expenses. Plaintiff JIMMY PETERSON further alleges that he has sustained and may in the future sustain "loss of income and/or impairment of earning capacity, the exact amount to be determined at the time of trial." See e.g., Plaintiff's Complaint at ¶¶ X, XI and XII.

4. If your notice of removal was filed more than thirty (30) days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date you first received a paper identifying the basis of removal: Not applicable. The Notice of Removal was filed within thirty (30) days after Defendant first received a copy of the Summons and Complaint.

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5. In actions removed on the basis of the Court's jurisdiction in which the action in
state court was commenced more than one year before the date of removal, the reasons this
action should not summarily be remanded to the state court. Not applicable. The Notice of
Removal was not filed more than one year after the state court action was commenced.
Plaintiff's original Complaint was filed in the Eighth Judicial District Court for Clark County,
Nevada, on June 27, 2017.

6. The name of any defendant known to have been served before you filed the notice of removal who did not formally join in the notice of removal and the reasons they did not: Not applicable. Upon information and belief, Defendant NEW PRIME, INC. is the only Defendant who has been served with the Summons and Complaint.

Dated this 6th day of July, 2017.

ALVERSON, TAYLOR MORTENSEN & SANDERS

Yani A. Wilson

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CERTIFICATE	OF ELI	ECTRONI	CSERVICE
CENTITIONIE			

I certify that on the 6th day of July, 2017, service of the above and foregoing DEFENDANT NEW PRIME, INC.'S STATEMENT CONCERNING REMOVAL was made by electronically filing a true and correct copy of the same to each party addressed as follows:

Steven M. Burris, Esq.

sb@steveburrislaw.com

Samuel B. Benham, Esq.

samb@steveburrislaw.com

LAW OFFICES OF STEVEN M. BURRIS

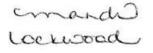
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Attorneys for Plaintiffs



Employee of ALVERSON, TAYLOR **MORTENSEN & SANDERS**

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